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7 Attorneys for Defendants
8 Adobe Systems Inc. and Intuit Inc.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

12
13 IN RE: HIGH-TECH EMPLOYEE
14 ANTITRUST LITIGATION

15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DEFENDANTS ADOBE SYSTEMS
INC. AND INTUIT INC.'S
STATEMENTS REGARDING
REDACTIONS**

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18 Defendants Adobe Systems Inc. and Intuit Inc. submit this statement in compliance with
19 the Court's March 13, 2013 Case Management Order (Dkt. 350).

20 Counsel for Adobe and Intuit met and conferred with counsel for plaintiffs today, and
21 agreed to the inspection process set forth below.

22 Adobe and Intuit produced approximately 230 documents and 150 documents,
23 respectively, with redactions of nonresponsive material. These documents consist of Board of
24 Director presentations, agenda, minutes, and other Board documents. The non-responsive
25 information pertains to discussions of potential mergers and acquisitions, long term growth
26 opportunities, individual restricted stock grant resolutions, audit committee matters and the like.
27 By agreement of the parties, Intuit provided a Non-Responsive Redaction Log in November,
28 2012, and an additional log today for 69 documents produced yesterday. Plaintiffs did not request

1 a similar log for Adobe's redacted documents so Adobe has produced only a privilege log.

2 As noted, the process agreed on by counsel for plaintiffs and counsel for Adobe and Intuit
3 is that, upon request by plaintiffs' counsel, Adobe will promptly make these documents available
4 for review by plaintiffs' counsel without redacting the non-responsive information so that, if they
5 choose, plaintiffs' counsel can verify the appropriateness of the redactions.

6 Dated: March 14, 2013

JONES DAY

8 By: /s/ Robert A. Mittelstaedt

9 Robert A. Mittelstaedt

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11 Inc.

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